

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Caron Nazario	:	
	:	
<i>Plaintiff,</i>	:	
	:	
v.	:	Civil Action No. 2:21-cv-00169
	:	
Joe Gutierrez,	:	JURY DEMANDED BY
<i>In his personal capacity</i>	:	PLAINTIFF
	:	
and	:	
	:	
Daniel Crocker	:	
<i>In his personal capacity,</i>	:	
	:	
<i>Defendants.</i>	:	

MOTION TO STAY PROCEEDINGS

Now Comes Defendant Daniel Crocker, by counsel, and moves to stay proceedings on the Complaint filed by Plaintiff Caron Nazario (“Nazario”) until the completion of ongoing state and federal investigations, or in the alternative, for a period of ninety days, pursuant to Rule 7(b) of the Federal Rules of Civil Procedure, for the reasons set forth in the accompanying memorandum of law.

Respectfully submitted 17th day of May, 2021.

DANIEL CROCKER

By: /s/ Anne C. Lahren

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CERTIFICATE OF SERVICE

I hereby certify that on this the 17th day of May, 2021, I will electronically file the foregoing *MOTION TO STAY PROCEEDINGS* with the Clerk of Court using the CM/ECF system, which will then notification of such electronic filing (NEF) to the following:

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